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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

APR 05 2022

SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

10 UNITED STATES DISTRICT COURT
11 FOR THE EASTERN DISTRICT OF WASHINGTON

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 JAIME HERRERA,

16 Defendant.

1:22-CR-2037-MKD

INDICTMENT

Vio: 18 U.S.C. §§ 1111, 1152
First Degree Murder in
Indian Country
(Count 1)

18 U.S.C. §§ 113(a)(1), 1152
Assault with a Dangerous
Weapon in Indian Country
(Count 2)

18 U.S.C. § 924(c)
Discharging and Using a
Firearm During and in
Relation to a Crime of
Violence
(Count 3)

18 U.S.C. § 924, 28 U.S.C.
§ 2461
Forfeiture Allegations

1 The Grand Jury charges:

2 COUNT 1

3 On or about July 19, 2017, in the Eastern District of Washington, within the
4 external boundaries of the Yakama Nation Indian Reservation, in Indian country,
5 the Defendant, JAIME HERRERA, a non-Indian, willfully, deliberately,
6 maliciously, and with premeditation and malice aforethought, did unlawfully kill
7 W.G.O., an Indian, by shooting W.G.O., with a firearm; all in violation of 18
8 U.S.C. §§ 1111, 1152.
9

10 COUNT 2

11 On or about July 19, 2017, in the Eastern District of Washington, within the
12 external boundaries of the Yakima Nation Indian Reservation, in Indian country,
13 the Defendant, JAIME HERRERA, a non-Indian, did intentionally assault W.G.O.
14 and C.E., who are both Indians, with a dangerous weapon, to wit: a firearm, with
15 intent to do bodily harm, all in violation of 18 U.S.C. §§ 113(a)(3), 1152.

16 COUNT 3

17 On or about July 19, 2017, in the Eastern District of Washington, the
18 Defendant, JAIME HERRERA, did knowingly use, carry, brandish, and discharge
19 a firearm, to wit: a rifle, during and in relation to a crime of violence for which he
20 may be prosecuted in a court of the United States, to wit: first degree murder, as set
21 forth in Count 1 of this Indictment and assault with a dangerous weapon, as set
22 forth in Count 2 of this Indictment, all in violation of 18 U.S.C. § 924(c).
23

24 NOTICE OF CRIMINAL FORFEITURE

25 The allegations contained in this Indictment are hereby realleged and
26 incorporated by reference for the purpose of alleging forfeitures.

27 Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction
28 of an offense in violation of 18 U.S.C. § 924(c), as set forth in Count 3 of this
Indictment, the Defendant, JAIME HERRERA, shall forfeit to the United States of

1 America, any firearm and ammunition involved or used in the commission of the
2 offense.

3
4 DATED this 5 day of April, 2022.

5
6 A TRUE BILL
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